



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

AAS:ICR/NJM
F. #2015R01787

*271 Cadman Plaza East
Brooklyn, New York 11201*

May 24, 2018

By FedEx and ECF

Robert J. Cleary, Esq.
Dietrich L. Snell, Esq.
Brittany N. Benavidez, Esq.
Proskauer Rose LLP
Eleven Times Square
New York, NY 10036

Re: United States v. Dan Zhong and Landong Wang
Criminal Docket No. 16-614 (DLI)

Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby furnishes discovery with respect to the above-referenced matter, the contents of which have been designated “Sensitive Discovery Material” under the terms of the Protective Order dated February 22, 2017 (Dkt. No. 37) (the “February 22 Order”). This disclosure supplements the government’s earlier disclosures under cover of letters dated February 15, May 22, May 24, June 12, July 12, July 24, August 30, October 24, December 1, December 8, December 14, December 17, and December 22, 2017, and January 15, January 18, January 19, February 2, February 7, February 15, and May 11, 2018. The government renews its request for reciprocal discovery from the defendant.

Enclosed is an encrypted thumb drive containing the following:

- Electronically stored information (“ESI”) extracted from an electronic device recovered during the search of the premises located at 210 Pavonia Avenue, Jersey City, New Jersey, which, as discussed on the April 24, 2018 telephone call, was initially not accessible to investigators and which has been designated “Sensitive Discovery Material” under the February 22 Order. (ESI 40831);

- ESI obtained from a search of an electronic device recovered during the search of the premises located at 210 Pavonia Avenue, Jersey City, New Jersey, which divides the material previously produced at ESI 37546 pursuant to your March 19, 2018 request and which has been designated “Sensitive Discovery Material” under the February 22 Order. (ESI 40832);
- ESI obtained from a search of an electronic device recovered during the search of the premises located at 349/351 Summit Avenue, Jersey City, New Jersey, which divides the material previously produced at ESI 37546 pursuant to your March 19, 2018 request and which has been designated “Sensitive Discovery Material” under the February 22 Order. (ESI 40833);
- As discussed on April 24, 2018, documents obtained from 347-353 Summit Ave Holding LLC, which have been designated “Sensitive Discovery Material” under the February 22 Order. (DZ066695 – DZ066706);
- Documents obtained from the Metropolitan Detention Center reflecting call logs for calls placed under the accounts of other inmates whose accounts the defendant used to place calls as well as money transfers to those inmates. (DZ066707 – DZ066738);
- As discussed on April 24, 2018, documents obtained from the Jersey City Police Department and the Jersey City Fire Department relating to inspections of premises in 2011, most of which were previously provided on or about January 9, 2017, and some of which have been designated “Sensitive Discovery Material” under the February 22 Order. (DZ066739 – DZ066884); and
- Pursuant to your May 3, 2018 request, less-redacted version of documents previously produced as DZ060697, DZ060794, DZ061024-DZ061026, DZ062838-DZ062842, DZ062847-DZ062849, DZ062850-DZ062852, and DZ062858, which have been designated “Sensitive Discovery Material” under the February 22 Order. (DZ066885 – DZ066901).

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact me.

Very truly yours,

RICHARD P. DONOGHUE
United States Attorney

By: /s/ Nicholas J. Moscow
Alexander A. Solomon
Douglas M. Pravda
Ian C. Richardson
Nicholas J. Moscow
Assistant U.S. Attorneys
(718) 254-7000

Enclosures (ESI00040831-ESI00040833)
(DZ066695-DZ066901)

cc: Clerk of the Court (DLI) (by ECF) (without enclosures)